

DS017 - Data Stewardship Awareness Training

BACKGROUND

Census Bureau employees and individuals with Special Sworn Status (SSS) are data stewards with the responsibility to protect the confidentiality and privacy of information that is entrusted to them. This means that data and information are handled appropriately, as authorized, and in compliance with relevant laws. It is vital that Census Bureau staff understand the principles and practices of good data stewardship in order to maintain public trust. Gaining and maintaining public trust is essential for the Census Bureau to fulfill its mission. In an era where network security threats are increasing and constantly evolving, Census Bureau staff must be prepared to identify those threats and follow the security practices that will protect hardware, software, networks, and data from damage, loss, or unauthorized disclosure.

The Census Bureau requires training about the everyday data stewardship processes and practices that support the Census Bureau's strict confidentiality and privacy standards with annual mandatory data stewardship awareness training. Starting in Fiscal Year 2023, annual mandatory data stewardship awareness training is part of the Data Handling University (DHU) in the Commerce Learning Center (CLC). The DHU may have many courses, but there are **four courses within DHU that comprise the annual mandatory data stewardship awareness training**:

- **Data Stewardship/Controlled Unclassified Information (CUI)**
- **Title 13(T13)/CUI**
- **Title 26 (T26)**
- **Cyber Security.**

The term "data stewardship awareness training" is used throughout this policy and refers to the four courses noted above. The penalty for non-compliance with completion of the annual mandatory data stewardship awareness training is the loss of network access after June 30.

PURPOSE

This policy mandates the necessary training staff must complete to ensure the Census Bureau fulfills its data stewardship responsibilities and formalizes penalties for non-compliance. Additionally, this policy establishes the basic requirements, and roles and responsibilities for implementing these requirements.

The DHU's Cyber Security course satisfies the requirement for staff to complete Information Technology Security Awareness Training as mandated by the Federal Information Security Management Act (FISMA). The DHU's Data Stewardship/CUI and T13/CUI courses provide the

necessary awareness of the laws and policies that apply to information protected by Title 13 U.S.C., the Privacy Act, and the Confidential Information Protection & Statistical Efficiency Act (CIPSEA).

The DHU's T26 course includes the additional training required by the Internal Revenue Service (IRS) for those who work with or around Federal Tax Information (FTI) protected by Title 26 U.S.C. Staff who work in areas or on networks where the use of Title 26 protected information is authorized must also complete a Title 26 Awareness Training module.

SCOPE

This policy covers all employees, contractors, and other SSS individuals who support the Census Bureau or access any Census Bureau facilities, systems, or data protected under Title 13 U.S.C., Title 26 U.S.C., Title 5, CIPSEA, and the E-Government Act.

POLICY

The following staff must complete the Data Stewardship Awareness Training module:

- All Census Bureau Employees
- All Contractors
- All with Special Sworn Status (SSS)

All new Census Bureau employees, contractors, and other SSS individuals with Census Bureau network access, regardless of worksite location or role, must take data stewardship awareness training in the CLC prior to or immediately upon onboarding. These staff must also complete new fiscal year data stewardship awareness training in the CLC by June 30. Staff who do not complete the data stewardship awareness training by June 30 each year will have their network access disabled until they provide proof that they have completed the training.

SSS with Incidental Access and no Network Accounts

There are Census Bureau SSS contractors who provide cleaning, food preparation, and maintenance services. These SSS staff must complete data stewardship awareness training using a stand-alone version of the training, or where not possible, a pamphlet-based version.

SSS with Temporary Limited Access to Title 13 Information and no Network Accounts

There are rare situations where the Policy Coordination Office (PCO) Chief may approve an individual be granted SSS for supervised and limited access to Title 13 information. These SSS must complete data stewardship awareness training using a stand-alone version of the training or a pamphlet-based version as specified by the PCO Chief's approval to confer SSS.

Exceptions for Data Stewardship Awareness Training Requirements

There are no exceptions allowed for non-completion of annual data stewardship awareness training for any employee, contractor, or other SSS individual.

Exceptions for completion of annual DHU Title 26 course:

- SSS who do not come to Headquarters, do not need access above the 1st floor, and do not access Title 26 data are not required to take Title 26 training module (for example, SSS at the National Archives and Records Administration).
- SSS at HQ who do not have badge access above the first floor are not required to take Title 26 training.
- Regional Office employees and SSS are not required to take Title 26 training, except Regional Directors, assistant Regional Directors, or designees.
- Field Representatives.

Tracking

The data stewardship awareness training courses are tracked in the CLC and the Commerce Business Systems (CBS) Education and Training Management Information System Plus (ETMIS+) to ensure course completion.

EFFECTIVE DATE

Upon signature

LEGAL AUTHORITIES

The Census Bureau's legal authority is Title 13, U.S.C. The Data Stewardship Awareness Training provides awareness and a basic understanding of the confidentiality aspects of Title 13 U.S.C., the Oath of Nondisclosure, the Privacy Principles, and the Unauthorized Browsing Policy.

The Census Bureau is authorized to use Federal Tax Information for statistical purposes by Title 26 U.S.C., the Internal Revenue Code. Title 26 describes the conditions under which the IRS may disclose FTI to other agencies. Title 26 also places specific requirements on the Census Bureau to safeguard and protect FTI.

Other laws that cover privacy and confidentiality at Census are Title 5, which includes the Privacy Act of 1974, the E-Government Act of 2002, and federal laws such as CIPSEA.

The Federal Information Security Management Act (FISMA), Title III of the E-Government Act of 2002 requires all personnel with access to IT resources take security awareness training annually.

Executive Order 13556 establishes an open and uniform program for managing information that requires safeguarding or dissemination controls pursuant to and consistent with law, regulations, and Government-wide policies. It also establishes a program for managing this information, hereinafter described as Controlled Unclassified Information, that emphasizes the openness and uniformity of Government-wide practice.

IMPLEMENTATION

Overall Responsibility

Responsibility for implementation of this policy and ensuring all courses are updated with current information lies with the Policy Coordination Office (PCO) and the Office of Information Security (OIS). Responsibility for hosting the delivery of the computer-based version of the courses lies with the Human Resources Division (HRD).

Division/Office Chief Responsibility

Division/Office Chiefs have primary responsibility for ensuring all employees complete the required module(s) annually, by June 30. All managers are responsible for allowing time for their staff to complete the required training. HRD and Division/Office Chiefs will be able to issue/generate reports to track training completion status for employees and SSS personnel.

Census Headquarters Employees and NPC

The data stewardship awareness training courses are delivered to all new Census Headquarters Employees via DHU in the CLC 14 days prior to onboarding. Network access and equipment will not be provided to new employees until this training is complete. Employees are responsible for completing data stewardship awareness training courses in the DHU annually thereafter in the CLC.

Special Sworn Status (SSS) Individuals

The data stewardship awareness training courses are delivered to all new SSS individuals who will have IT access via DHU in CLC 14 days prior to onboarding. Network access and equipment will not be provided until this training is complete. These SSS individuals are responsible for completing data stewardship awareness training courses in the DHU annually thereafter in the CLC.

SSS individuals who do not need access to the IT network, such as cafeteria workers, guards, cleaning crews, etc., will be provided links to the data stewardship awareness training and will be notified of their responsibility to complete the computer-based training on the Census Internet site and to sign completion certificates. These certificates will be provided to Census Investigative services (CISD), who will process and record the training in the Centralized Application for Managing Personnel Investigations and Non-employees (CAMPIN). CAMPIN records feeds completion records into CBS ETMIS. In the event these SSS individuals are unable to access the Census Internet site to complete these computer-based trainings, they may receive the data stewardship awareness trainings via a pamphlet-based version only upon receiving explicit permission from the PCO Division Chief.

Field Division (FLD)

Regional Office (RO) employees must take Data Handling training before being issued equipment.

The data stewardship awareness training courses are delivered to all new Field Employees via DHU in CLC 14 days prior to onboarding. Network access and equipment will not be provided to new employees until this training is complete. Employees are responsible for completing data stewardship awareness training courses in the DHU annually thereafter in the CLC. FLD will establish an equitable method for funding the cost for FRs to complete the course.

Implementation and Awareness Strategies

PCO is responsible for updating the Data Stewardship/CUI, Title 13/CUI, and T26 course contents of DHU each year. OIS is responsible for updating the Cyber Security DHU course. PCO is responsible for updating the pamphlet-based version of the data stewardship awareness training each year. HRD maintains the contract with the CLC vendor and is responsible for ensuring individuals are registered for the training in the CLC. PCO and OIS Chiefs will brief Division/Office Chiefs prior to training rollout each year to discuss implementation. PCO will coordinate broadcasts to announce the launch of new fiscal year trainings in October and will send reminder broadcasts as needed. PCO will begin sending reports of training noncompliance to Division Chiefs in April and continue through the date that network access will be turned off for those found to be noncompliant.

Training Noncompliance

PCO will work with the Client Support Division (CSD) to disable computer access for those found to be noncompliant.

PCO will supply a centralized workstation at headquarters, if needed, for those who must complete the course to regain access. Any employee whose access is suspended must contact PCO to schedule training completion(s) on the workstation. PCO will work with CSD to enable the users upon proof of training completion.

POLICY OWNER

The Policy Coordination Office owns this policy.

SIGNATURE

Ron S. Jarmin
Chair, Data Stewardship Executive Policy Committee
U.S. Census Bureau

Summary Information	
Policy Title:	DS017 Data Stewardship Awareness Training
Date Signed:	See signature line
Last Reviewed:	7/25/2022
Intended Audience:	All Staff
Policy Owner:	Policy Coordination Office
Office Responsible for Implementation:	PCO; OIS
Office Responsible for Dissemination:	PCO
Stakeholder Vetting:	PCO; OIS; HRD; CISD; FLD; NPC; CSD